

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT
REVISED

PERMITTEE

The Willy Wonka Candy Factory
Attn: R. J. Tikwart
1445 West Norwood Avenue
Itasca, Illinois 60143

Application No.: 73100086
Applicant's Designation: EXPNSN1999
Subject: E-Tablet Line/Pan Lines
Date Issued:
Location: 1445 Norwood Avenue, Itasca

I.D. No.: 043050AAG
Date Received: November 15, 2004
Expiration Date:

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of a bulk storage silo with baghouse, one bulk conveying system, 4 mixing and tableting lines with one dust collector, 1 mixing and tableting line consisting of a lumpbreaker, mill and mixer, and a separate mixer both serving a fourth tableting line with one dust collector for this system; 21 syrup kettles, 10 panning systems each with dust collection system and packaging department controlled by baghouse pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 25 tons per year of volatile organic material (VOM) and 100 tons per year of particulate matter less than 10 microns (PM₁₀)). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
2. Usage and emissions of VOM in the 10 panning systems shall not exceed the following limits:

<u>Ingredients</u>	<u>Usage</u>		<u>Average VOM</u>	<u>Emissions</u>	
	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>Content</u> <u>(% weight)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Miscellaneous				0.03	0.3
Flavors	22.7	170.3	14.38	3.30	24.0
			Total	3.33	24.3

These limits are based on the maximum usage and VOC content of colors and flavors, indicated in the permit application. Compliance with annual limits shall be determined from a running total of 12 months of data.

3. Emissions of particulate matter and operation of equipment shall not exceed the following limits:

<u>Emission Unit</u>	<u>Production Rate</u>		<u>Emissions</u>	
	<u>(Tons/Hr)</u>	<u>(Tons/Yr)</u>	<u>(Lb/Hr)</u>	<u>(Tons/Yr)</u>
Bulk Dextrose Silo	20.0	32,850	1.6	3.0
Bulk Conveying System	5.6	34,881	0.8	3.5
Mixing and Tableting Lines	5.6	35,000	1.6	7.1
Panning Systems	2.0	17,520	1.0	4.4
			Total	18.0

These limits are based on the maximum production rate and hours of operating indicated in the permit application. Compliance with annual limits shall be determined from a running total of 12 months of data.

4. Operation and emissions of the natural gas-fired equipment (combined) shall not exceed the following limits:

Natural Gas Usage: 10 mmscf/month, 60 mmscf/year

<u>Pollutant</u>	<u>Emission Factor</u>	<u>Emissions</u>	
	<u>(Lb/mmscf)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Nitrogen Oxides (NO _x)	100	0.75	4.5
Carbon Monoxide (CO)	84	0.63	3.8
Particulate Matter (PM)	7.6	0.07	0.4
Volatile Organic Material (VOM)	5.5	0.05	0.3

These limits are based on the maximum firing rates and standard AP-42 emission factors. Compliance with annual limits shall be determined on a monthly basis from a running total of 12 months of data.

- 5a. The Permittee shall, in accordance with the manufacturer and/or vendor recommendations, perform periodic maintenance on the pollution control equipment covered under this permit such that the pollution control equipment be kept in proper working condition and not cause a violation of the Environmental Protection Act or regulations promulgated therein.
- b. For each fabric filter, the Permittee shall, at a minimum perform internal and external inspections, twice each year. Permittee shall inspect for leaks, holes, seals, wear, and other problems, and repair all problems found in a timely manner.
6. In the event that the operation of this source results in an odor nuisance, the Permittee shall take appropriate and necessary actions to

minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the nuisance.

7. No person shall cause or allow any visible emissions of fugitive particulate matter from any process, including any material handling or storage activity beyond the property line of the emission source, pursuant to 35 Ill. Adm. Code 212.301.
- 8a. Within 90 days of a written request from the Illinois EPA or USEPA, pursuant to 35 Ill Adm. Code Section 201.282, control efficiency of the designated air pollution control equipment, emissions and opacity of the storage silo baghouse and mixing/tableting lines dust collector exhaust from the plant shall be measured by an approved testing service, during conditions which are representative of the maximum performance. The Illinois EPA may provide additional time for the performance of this testing upon request from the Permittee which shows that it is not feasible to perform representative testing within 90 days.
 - b.
 - i. The following methods and procedures shall be used for testing of emissions. Refer to 40 CFR 60, Appendix A for USEPA test methods.

Location of Sample Points	USEPA Method 1
Gas Flow and Velocity	USEPA Method 2
Particulate Matter	USEPA Method 5
Opacity	USEPA Method 9
 - ii. A test shall consist of three separate runs each at least 60 minutes in duration. Compliance shall be determined from the average of the runs provided that the Illinois EPA may accept the arithmetic mean of the two runs in circumstances described in 40 CFR 60.8(f).
 - c. Testing shall be performed by a qualified independent testing service.
 - d. At least 30 days prior to the actual date of testing a written test plan shall be submitted to the Illinois EPA for review and approval. A copy shall also be submitted to the USEPA. This plan shall describe the specific procedures for testing, including:
 - i. The person(s) who will be performing sampling and analysis and their experience with similar tests.
 - ii. The conditions under which testing will be performed, including a discussion of why these conditions will be representative of the maximum operating rate, the levels of operating parameters at or within which compliance is intended to be shown, if applicable, and the means by which the operating parameters for the process and any control equipment will be determined.
- 9a. The Final Report(s) for all tests shall be submitted within 180 days after the date of the test. The Final Report shall include as a minimum:

- i. General information describing the test, including the name and identification of the emission source which was tested, date of test, names of personnel performing the tests, and Illinois EPA observers, if any;
 - ii. A summary of results;
 - iii. Description of test procedures, including description of sampling points, test equipment, and test schedule;
 - iv. Detailed description of test conditions, including:
 - A. Process information, i.e., process rate, aggregate type, fuel type, and firing rate.
 - B. Control equipment information, i.e., equipment condition and operating parameters during testing.
 - v. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration.
- b. Submittals of information shall be made as follows:
- i. Notices of Test - one copy to Source Emission Test Specialist and one copy to the Regional Office.
 - ii. Final Report - one copy to Source Emission Test Specialist, one copy to the Regional Office, and one copy to Permit Section.
10. The Permittee shall maintain records of the following items:
- a. Production rate of dextrose silo, (ton/day and ton/year).
 - b. Production rate of bulk conveying system, (ton/day and ton/year).
 - c. Production rate of mixing and tableting lines, (ton/day and ton/year).
 - d. Production rate of engrossing pans, (ton/day and ton/year).
 - e. VOM containing ingredients (colors/flavors), (pounds/day and ton/year).
 - f. VOM content in colors/flavors (% weight).
 - g. Natural gas usage (mmscf/month and mmscf/year).
11. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and

copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.

12. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
13. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

If you have any questions on this, please call George Kennedy at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:GMK:psj

cc: Illinois EPA, FOS Region 1
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from this candy manufacturing plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels, e.g., 25 tons of per year of VOM at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled, and control measures are more effective than required in this permit.

<u>System/Equipment</u>	<u>Emissions (Tons/Year)</u>			
	<u>PM</u>	<u>VOM</u>	<u>NO_x</u>	<u>CO</u>
Bulk Dextrose Silo	3.0			
Bulk Conveying	3.5			
Mixing and Tableting Lines	7.1			
Panning Systems	4.4	24.3		
Natural Gas Combustion	<u>0.4</u>	<u>0.3</u>	<u>4.5</u>	<u>3.8</u>
Totals:	18.4	24.6	4.5	3.8

GMK:psj